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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

NOAH ROSKIN-FRAZEE,

Defendant.

CASE NO. 25-CR- 0053-WHO (PK)

**STIPULATION AND [PROPOSED] ORDER TO
MODIFY CONDITIONS OF PRE-TRIAL
RELEASE**

On December 11, 2024, Defendant Noah Roskin-Frazee was arrested and placed on pre-trial release in 23-CR-0471-WHO with a number of conditions, including that he surrender his passport and that his travel be restricted to the Northern District of California, where his permanent residence with his mother is located, and the Central District of California, where he was then attending college. (Dkt. 8). There have been several travel modifications since:

- On January 31, 2024, the Court modified his release conditions to allow travel to Las Vegas, Nevada, where his father resides. (Dkt. 18).

- On February 13, 2024, the Court further modified Mr. Roskin-Frazee's travel conditions to include the Eastern District of California as the most direct routes between his home and school, either by car and air, required that he travel through or over that district. (Dkt. 24).
- On June 28, 2024, the Court modified his release conditions to allow international travel to London, Scotland, and Barcelona between July 19 to July 29, 2024 and Canada between August 5 to August 14, 2024. (Dkt. 46).
- On December 3, 2024, the Court modified his release conditions to allow travel to Hawaii with his family from January 3, 2025 to January 10, 2025. (Dkt. 71).

To date, Pretrial Services has not alleged that Mr. Roskin-Frazee has violated any of the terms or conditions of pre-trial release.

On February 27, 2025, Defendant Roskin-Frazee was arraigned on the above referenced misdemeanor Information (25-CR-0053-MAG) and released on the same terms and conditions as in 23-CR-0471-WHO. The misdemeanor case was related to Judge Orrick. Mr. Roskin-Frazee now requests that the Court modify his release conditions in both cases to allow for unrestricted domestic travel with advance permission and approval from Pre-trial Services. Neither Mr. Roskin-Frazee's pre-trial services officer nor United States Attorney Nikhil Bhagat object to Mr. Roskin-Frazee's request.

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1 AUSA Bhagat has reviewed this Stipulation and [Proposed] Order and authorizes undersigned
2 counsel to file it on the parties' behalf.

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4 **IT IS SO STIPULATED.**

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6 DATED: February 28, 2025

Respectfully submitted,

7 **CONRAD | METLITZKY | KANE LLP**

8 */s/ Miranda Kane*

9 MIRANDA KANE

10 Attorney for Noah Roskin-Frazee

11
12 DATED: February 28, 2025

MARTHA BOERSCH

13 Attorney for the United States

14 Acting Under Authority Conferred by 28 U.S.C. § 515

15 */s/ Nikhil Bhagat*

16 NIKHIL BHAGAT

17 Assistant United States Attorney

[PROPOSED] ORDER

GOOD CAUSE BEING SHOWN and pursuant to the parties' stipulation, Noah Roskin-Frazee's condition of pre-trial release in 25-CR-0053-WHO shall be modified to allow unrestricted domestic travel with advance permission and approval from Pre-Trial Services. All other conditions of release shall remain in effect.

IT IS SO ORDERED.

Dated: _____

THE HONORABLE PETER KANG
United States Magistrate Judge